

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

NANCY S. CASACCA,

Plaintiff,

v.

CASE NO. 1:22-cv-23419-PCH

FRONTIER AIRLINES INC.,

Defendant.

/

**UNOPPOSED MOTION TO EXTEND REMAINING
DEADLINES AND TRIAL SETTING**

Defendant, Frontier Airlines, Inc., hereby respectfully requests that the Court extend the remaining deadlines and continue the current trial setting:

1. Plaintiff's deposition was previously scheduled for June 28, 2023.

However, Plaintiff began new employment the week of June 26, 2023. As a result, Plaintiff requested to delay her deposition so as not to impact her new job.

2. In an order to accommodate this request, Defendant agreed to move Plaintiff's deposition to the next available date for both counsel for Defendant and Plaintiff, July 12, 2023.

3. This accommodation had the effect of delaying the depositions for Defendant's witnesses which were set on July 12, 2023. As a result, the depositions in this matter will not be completed until Monday, July 17, 2023.

4. The current dispositive motion deadline is Tuesday, July 18, 2023.

Defendant will be seriously prejudiced if this deadline remains intact. None of the deposition transcripts will be available in time for review or filing on July 18, 2023. Moreover, Defendant's counsel will not have ample time to prepare the dispositive motion and brief because depositions will be ongoing up to the due date for these filings.

5. In addition, the Parties are continuing to engage in settlement negotiations and request additional time to finalize those discussions prior to the summary judgment submission date.

6. Defendant's counsel discussed this motion with counsel for Plaintiff who does not object to the same.

7. Based on the foregoing, Defendant respectfully requests that the court extend the calendar call to a mid or late October 2023 jury week. This extension will have the effect of extending both the discovery cutoff and summary judgment deadlines in this matter until 55 days before the new trial setting.

/s/ Janell M. Ahnert

Janell M. Ahnert (FBN 123161)

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Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of June 2023, a true and correct copy of the foregoing was electronically filed and served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel or parties of record below, and also via any additional manner noted below.

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/s/ Janell M. Ahnert

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